

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
ROBERTO BAUTISTA FRANCO BACCANELLI,

Plaintiff,

-against-

THE REPUBLIC OF ARGENTINA,

Defendant.
----- X

07 Civ. 3851 (TPG)

**DEFENDANT'S FIRST
REQUEST FOR THE
PRODUCTION OF
DOCUMENTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, defendant the Republic of Argentina (the "Republic") requests that plaintiff produce for inspection and copying any and all copies of the documents requested herein on or before August 15, 2007 at the offices of Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, New York 10006 (Attn.: Jonathan I. Blackman).

DEFINITIONS

1. Unless otherwise indicated, the Republic adopts and incorporates herein the uniform definitions for discovery requests set forth in subparagraphs (c) and (d) of Rule 26.3 of the Local Civil Rules of the United States District Court for the Southern District of New York and the terms used herein are to be construed accordingly.

2. "Document(s)" means and includes all writings in any form, notes, memoranda, manuals, reports, records, correspondence, drawings, graphs, charts, photographs, telephone records, data compilations of whatever nature (including those from which information can be obtained or translated if necessary), tape recordings, electronic mail messages, and electronic data (including any exchange of information between computers and all information stored in an electronic form or computer database).

3. The "Complaint" means the Complaint in this action, dated May 15, 2007.

4. "Plaintiff," "You" and "Your" mean Robert Bautista Franco Baccanelli, and includes any brokers, trustees, beneficiaries, advisors (including but not limited to investment or financial advisors), agents, and employees of Plaintiff.

5. The "Republic" means defendant the Republic of Argentina and the officials, employees, and agents representing the Republic, including but not limited to the Republic's public officials, investment bankers, agents (including fiscal agents and trustees), registrar, and legal counsel.

6. The "Republic Bond" or "Republic Bonds" means any bond issued by the Republic, including any Republic Bond alleged in the Complaint to be held by Plaintiff.

INSTRUCTIONS

1. These Document Requests are continuing in nature. In accordance with Rule 26(e) of the Federal Rules of Civil Procedure, You are required to file supplementary answers and produce additional Documents if You obtain further or different information and the Republic specifically reserves the right to seek supplementary answers and the additional supplementary production of Documents before trial.

2. Unless otherwise indicated, the time period covered by these Document Requests is the earliest date on which Plaintiff purchased a Republic Bond to the present.

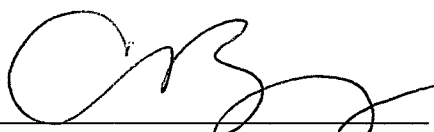
3. Where a claim of privilege is asserted in objecting to any Document Request, identify the nature of the privilege (including work product) that is being claimed and the privilege rule being invoked, and for each Document withheld provide the following information:

(a) the type of Document;

3. All Documents concerning Your purpose in acquiring Your Republic
Bonds.

Dated: New York, New York
July 16, 2007

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: 
Jonathan I. Blackman (JB 3846)
Carminc D. Boccuzzi (CB 2177)

One Liberty Plaza
New York, New York 10006
(212) 225-2000

Attorneys for the Republic of Argentina

TO: Joel A. Chernov, Esq.
Dreier LLP
499 Park Avenue
New York, New York 10022

Attorneys for Plaintiff